

EXHIBIT "A"

Dana L. Jorden

From: Sarah A. Elia
Sent: Tuesday, August 06, 2019 1:42 PM
To: 'brad@sadeklaw.com'
Subject: Beneficial v. Javier Arjona and Wanda Perez (2468 Elfreth's Alley) #693002 0094687:

Hi Brad – As you may recall, we represent WSFS. My client advises Ms. Perez is in default under the Stipulation of Settlement by failing to pay the regular monthly payment that was due on August 1. Per the terms of the Stipulation, we may file a Certificate of Default if the default is not cured within five days.

Thanks,
Sarah

Sarah A. Elia, Partner

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Weber Gallagher Simpson Stapleton Fires & Newby LLP

EXHIBIT "B"

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: WANDA I. PEREZ-ARJONA		BANKRUPTCY CASE
	Debtor	NO.: 18-12382
Wilmington Savings Fund Society		CHAPTER 13
	Movant	
v.		
Wanda I. Perez-Arjona		
	Respondent	

ORDER GRANTING RELIEF FROM THE AUTOMATIC STAY

AND NOW, this _____ day of _____, 2019, upon consideration of the Motion of Wilmington Savings Fund Society (“Movant”) for relief from the automatic stay pursuant to 11 U.S.C. Section 362(d)(1), it is hereby

ORDERED that, pursuant to Section 362(d)(1) of the Bankruptcy Code, the automatic stay of Bankruptcy Code Section 362(a) is terminated so as to permit Movant to commence and prosecute to conclusion one or more actions in the courts of appropriate jurisdiction to foreclose any mortgages held by Movant on the property owned by Debtor located at 2468 Elfreth’s Alley, Bensalem, PA 19020.

FURTHER ORDERED that this Order shall also be applicable to Javier Arjona under Section 1301(c)(3) of the Bankruptcy Code.

FURTHER ORDERED that Rule 4001(a)(3) should not be applicable to this Order and Movant should be allowed to immediately enforce and implement this Order.

Magdalene D. Coleman, U.S.B.J.